

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	
)	No.: 08 CR 124
)	Honorable Judge Virginia M. Kendall
JOSE DE JESUS ALVARADO -TIZOC,)	
)	
Defendant.)	

**DEFENDANT'S AGREED MOTION FOR EXTENSION OF TIME
FOR FILING OF PRETRIAL MOTIONS**

The defendant, **JOSE DE JESUS ALVARADO-TIZOC**, by and through his attorney, **ROBERT L. RASCIA**, respectfully moves this Honorable Court to enter an order granting him an extension of time for the filing of his pretrial motions.

In support thereof the Defendant states as follows:

1. The defendant has received discovery materials in this matter which consisted of voluminous written reports, and compact disks.
2. That counsel has not finished a review of these materials, and has not yet discussed the material with the defendant who is currently incarcerated and also requires the assistance of Spanish language interpreter.
3. Counsel has been recently been engaged in the preparation of a jury trial of the cause entitled The People of the State of Illinois v. Ariel Bueno, No. 06 CR 11059, who was charged with two separate counts of First Degree Murder, in the Circuit Court of Cook County, Illinois, County Department, Criminal Division, Judge Toomin presiding. Which was disposed of in a pretrial disposition the day the trial was to begin.

4, Counsel discussed this request with AUSA Tara Brown. Ms. Brown indicated she does not oppose this request.

5. Counsel respectfully requests an extension of time to on or about May 16, 2008, for the filing of his pretrial motions.

WHEREFORE, the Defendant respectfully prays for this Honorable Court to enter an order granting an extension of time for the filing of his pretrial motions to May 16, 2008.

Respectfully Submitted,

S/Robert L. Rascia/April 25, 2008

ROBERT L. RASCIA, ARDC No. 6184470

Attorney for the Defendant

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CERTIFICATE OF SERVICE

I, **ROBERT L. RASCIA**, deposes and states that I have served a copy of the Defendant's Agreed Motion for Extension of Time for Filing of Pretrial Motions to Tara Brown, Assistant United States Attorney, VIA ELECTRONICALLY FILING on this 25th day of April, 2008.

S/Robert L. Rascia/April 25, 2008

ROBERT L. RASCIA, ARDC No. 6184470

Attorney for the Defendant

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